

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**  
 In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers, <i>Co-Chair</i> Donald A. Migliori, <i>Co-Chair</i> Robert T. Haefele, <i>Liaison Counsel</i> MOTLEY RICE LLC	Sean Carter, <i>Co-Chair</i> Stephen A. Cozen, <i>Co-Chair</i> J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**VIA ECF**

October 11, 2022

The Honorable George B. Daniels  
 Daniel Patrick Moynihan U.S. Courthouse  
 500 Pearl Street New York, NY 10007

The Honorable Sarah Netburn, U.S. Magistrate Judge  
 Thurgood Marshall U.S. Courthouse, Room 430  
 40 Foley Square  
 New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Judge Daniels and Judge Netburn:

The leadership of the PECs write briefly in response to Motion to Stay and Declaration in support found at ECF #8608 and ECF #8610 filed by the Kreindler firm. We will not respond to all of the inaccuracies set forth in these latest submissions, but we are compelled to inform the Court we dispute the veracity of the facts and characterizations as recited in Mr. Maloney's declaration. Should the Court wish to hear anything further from the PECs on these submissions, we stand willing to do so, but we do not believe it is necessary or productive to engage in any further distractions created by the Kreindler firm.

We remind the Court, the parties, and our clients that the undersigned spearheaded this case and this MDL since its formation in 2003, and that Motley Rice has continuously led on behalf of the personal injury and wrongful death clients since the original *Burnett v. Al Baraka* filing in August of 2002. We reaffirm our commitment to leading this complex consolidation on behalf of *all* Plaintiffs, as stated in our filing of October 4, 2022, ECF #8603.

Respectfully submitted,

MOTLEY RICE LLC

By: /s/ Jodi Westbrook Flowers  
 JODI WESTBROOK FLOWERS  
 DONALD A. MIGLIORI  
 ROBERT T. HAEFELE  
 MOTLEY RICE LLC

COZEN O'CONNOR

By: /s/ Sean P. Carter  
 SEAN P. CARTER  
 STEPHEN A. COZEN  
 J. SCOTT TARBUTTON  
 COZEN O'CONNOR

The Honorable George B. Daniels  
The Honorable Sarah Netburn  
October 11, 2022  
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28 Bridgeside Boulevard  
Mount Pleasant, SC 29464  
Tel.: (843) 216-9163  
Email: [jflowers@motleyrice.com](mailto:jflowers@motleyrice.com)  
Email: [dmiglioni@motleyrice.com](mailto:dmiglioni@motleyrice.com)  
Email: [rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)  
For Personal Injury and Death Claims PEC  
For Plaintiffs' Executive Committees

One Liberty Place  
1650 Market Street, Suite 2800  
Philadelphia, Pennsylvania 19103  
Tel.: (215) 665-2105  
Email: [scarter@cozen.com](mailto:scarter@cozen.com)  
Email: [scozen@cozen.com](mailto:scozen@cozen.com)  
Email: [starbutton@cozen.com](mailto:starbutton@cozen.com)  
For Commercial Claims PEC  
For Plaintiffs' Executive Committees

cc: All Counsel of Record via ECF